## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

**MDL No. 2875** 

THIS DOCUMENT RELATES TO ALL CASES

HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

## PLAINTIFFS' NOTICE OF MOTIONS IN LIMINE

TO: Jessica Davidson, Esq,
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PLEASE TAKE NOTICE that Plaintiffs shall move before the Honorable

Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master,

at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey, for an Order granting their motions in limine, as described in greater detail in the accompanying brief and proposed order.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the brief, supporting certification, and proposed order filed herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC Attorneys for Plaintiffs

By:	/s/ Adam M.	Slater
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Dated: February 16, 2024

**CERTIFICATE OF SERVICE** 

I hereby certify that on February 16, 2024, I electronically filed this motion,

a supporting brief, a partially redacted supporting certification, and proposed order

with the Clerk of the Court using CM/ECF system which will send notification of

such filing to the CM/ECF participants registered to receive service in this MDL. In

addition, I hereby certify that copies of foregoing documents, excluding the

numerous exhibits, will be served contemporaneous to filing via email on the Court,

Special Master, and Jessica Davidson at Jessica. Davidson@skadden.com, Lori

Cohen at CohenL@gtlaw.com, and Jay Lefkowitz at lefkowitz@kirkland.com. The

exhibits will be sent via FedEx to the Court via a thumb drive, and emailed to the

Special Master and Jessica Davidson at Jessica. Davidson@skadden.com, Lori

Cohen at CohenL@gtlaw.com, and Jay Lefkowitz at lefkowitz@kirkland.com using

a Dropbox link.

MAZIE SLATER KATZ & FREEMAN, LLC

Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 16, 2024

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